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Owen F. Duffy (OD-3144)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TRANSFIELD ER CAPE LIMITED

Plaintiff,

- against -

FUCHUEN DIHAI SHIPPING CO. LTD., and  
ZHEJIANG FUCHUEN CO. LTD.

Defendants,

07 CV 04528 (MGC)

## NOTICE OF MOTION

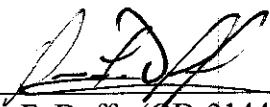
PLEASE TAKE NOTICE, that pursuant to Federal Rule of Civil Procedure 7 (b) (1), Rule E (4)(f) of the Supplemental Rules for Admiralty or Maritime Claims and Local Civil Rule 6.1 of the United States District Court for the Southern District of New York, and upon the accompanying Affidavit of Owen F. Duffy, dated June 27, 2007, the exhibits thereto and the accompanying Memorandum of Law, the Defendant Zhejiang Fuchuen Co. Ltd. will move, as soon as counsel may be heard, for an Order Vacating the Process of Maritime Attachment and Garnishment issued in this action and for an Order

dismissing the Complaint against the Defendant Zhejiang Fuchuen Co. Ltd. Any opposition to this motion must be made within the time prescribed by Local Civil Rule 6.1.

Dated: New York, New York  
June 28, 2007

CHALOS, O'CONNOR & DUFFY  
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By:

  
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